STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

October 4, 1985

Mr. R.C. Weiss
Plant Engineer
Pratt and Whitney Aircraft Group
Division of United Technologies
400 Main Street
East Hartford, CT 06108

RCRA RECORDS CENTER Andy
FACILITY Pratt & Whitney Main St
I.D. NO. CTD990672081
FILE LOC. R-1B
OTHER RDMS #2784

Re: Part B Application
Pratt & Whitney
400 Main Street
Hartford, Connecticut 06108
EPA I.D. No. CTD990672081

Dear Mr. Weiss:

The Connecticut DEP has conducted a review of Pratt & Whitney Aircraft Group, 400 Main Street, East Hartford, Connecticut preliminary application under the Resource Conservation and Recovery Act (RCRA) for a permit to store, treat, and dispose of hazardous waste. A review of the preliminary application has been made to determine if the information submitted is complete under Section 25-54cc(c)-16 of the Connecticut Hazardous Waste Management Regulations and 40CFR Section 270. It has been determined that the preliminary application is incomplete and we have specified in our attachment to this letter the additional information needed.

Further processing of your permit will begin when this information is received. Please submit the necessary information within 45 days of receipt of this request. After DEP determines that the application is complete, any additional information request will be limited to that necessary to clarify, modify, or supplement previously submitted material.

Your response to our comments may be in the form of a totally revised complete Part B application or revised pages which can be inserted into the original Part B submission.

If you choose to submit revised pages, please provide the following information.

1. Page numbers should be shown for the entire application;
2. For each submitted, indicate if it is a revision to a page in the original submitted or a new page not contained in the original submittal; and

Phone:
165 Capitol Avenue • Hartford, Connecticut 06106

3. Date or code each page, for example: 32(R-5/7/84) means page 32 revised May 7, 1985.

All revisions to your Part B application must include a new certification with the appropriate signatures as required by 40CFR Section 270.11. Additionally, if you wish to claim confidentiality on any new information, please submit a claim in accordance with 40CFR Section 270.12.

If there are any questions, please call (203)566-5712.

Sincerely,

George Dews
Senior Sanitary Engineer
Hazardous Waste Management Section

cc: Andrew Hoffman- US EPA Region I

GD/mada
attachments

Attachment: Pratt & Whitney Aircraft
400 Main Street
East Hartford, Connecticut
EPA I.D. Number CTD990672081
Permit Application Notice of Deficiency

The following information outlines areas where the Pratt and Whitney Permit Application does not meet the requirements for a RCRA Part B permit application given in 40 CFR Part 270 and Part 264 and in sections 25-54cc(c)-16(d) and 25-54cc(c)-19 of the Connecticut Hazardous Waste Management Regulations. Additional information is necessary in each of the following areas in order to begin a more technical review of Pratt and Whitney's permit application:

Part A Application

Form 3 page 1 of 5 states

Process Code	Process Design Capacity
SO_1	68,840 gallons
SO_1	27,300 gallons

OK

Either combine these codes or change one code to SO_2 as specified in earlier submittals.

Section G -GENERAL HAZARDOUS WASTE FACILITY REQUIREMENTS (40CFR 270.14(b)(8))

Specify how Pratt & Whitney will prevent mixing of incompatible hazardous waste specifically cyanides and acids, in the tanker spill containment tank. Mixed residuals of acids and cyanides could create a serious human health hazard.

Section M- STORAGE OF CONTAINERS (40 CFR 270.15 and 264 Subpart I)

Page 126 states that aisle space is not needed because of the openness of the area and the nonflammability of the wastes. However, aisle space is also necessary so that all drums can be inspected. Verify that all drums can be fully inspected in this section. OK

The maximum number of liquid filled drums for the barrel storage building is 350. The drum printout provided (Exhibit Z) shows 5 drums of solid hazardous waste in storage. This does not indicate the total volume of hazardous waste liquids in storage. Provide a printout clearly showing OK

the total volume of hazardous waste liquids in the storage facility for a typical day. Also four compartments in the storage area have a maximum liquid filled drum capacity of 43 drums. Demonstrate how each compartments' capacity will not be exceeded.

Section O and Appendix 3- LIQUID INJECTION INCINERATOR (40 CFR 270.19 and 264 Subpart O)

1.) Page 7 in Appendix 3 states that the scrubber water flow rate is 98 GPM. However, table IV on page 25 states it to be 38 GPM. Which is the correct value?

2.) Verify that the sample waste streams in table III have the proper chlorine concentration as specified in table II.

3.) The expected flue gas temperature and volumes in Table III are not entirely within the test range as specified in table IV. Please provide consistency between these variables.

4.) Please clarify where the liquid entrainment from the demister system drains to.

5.) Prepare a temperature range to be tested during the trail burn which corresponds to the expected operating temperature range.

6.) The auxiliary gas flow rate and combustion zone temperature should be monitored throughout the trail burn.

7.) Prepare procedures for testing the emergency shut down and waste feed cutoff equipment.

8.) Describe the calibration steps for the temperature, pressure, flow rate, combustion gas velocity and CO monitoring equipment.

9.) The pressure drop across both the packed tower scrubber and demister should be added to the list of "suggested operating conditions" found on page 141 of the Pratt & Whitney submittal.

10.) Combustion gas velocity, as measured by the system discussed on page 138 of the Pratt & Whitney submittal, should be added to the list of "suggested operating conditions".

11.) Stack oxygen readings from the Charlton technology, Inc. monitoring system should be added to the list of "suggested operating conditons".

12.) The oxygen and carbon monoxide monitors should sucessfully complete Performance Specification Test (PST) 3 and 4, respectively prior to the trial burn. PST 3 is found in 40 CFR 60, Appendix B. PST 4 was published on pages 31700-31702 of the August 5, 1985 Federal Register.

13.) Specify in gallons/minute the anticipated feed rates for each waste stream and the auxiliary fuel.

14.) Specify procedures for ash sampling and analysis.

15.) Scubber inlet particulate and carbon monoxide sampling is not required by EPA regulations (see Tables VI-IX of RECON submittal.

16.) On page 26, RECON proposes using a modified Method 5 sampling train for POHC testing, while on page 49, the SASS train is proposed. Which method do they intend to use?

17.) RECON has presented a general description of the sampling and analytical techniques to be used. A much more detailed sampling and analysis protocol should be submitted.

18.) Please provide a date and schedule for conducting the trial burn.

Section L- FINANCIAL ASSURANCE AND LIABILITY INSURANCE (40 CFR Part 270.14(b)(17) and 264. Subpart H)

The financial assurance mechanism must be updated. The facility cost estimate must be revised using the implicit price deflator for 1984. Please revise and submit this document.